



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JUL 28 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

Mr. Michael Henley
Plant Manager
Idaho Forest Group, LLC – Athol Facility
4447 East Chilco Road
Athol, Idaho 83801

Re: Idaho Forest Group, LLC – Athol Facility
Multi-Sector General Permit Number IDR05C979

Dear Mr. Henley:

On July 16, 2015, the United States Environmental Protection Agency (EPA) conducted an inspection of Idaho Forest Group, LLC – Athol Facility ("Facility") in Athol, Idaho. The purpose of the inspection was to determine the Facility's compliance with the requirements of the Clean Water Act (CWA), and the 2008 Multi-Sector General Permit (MSGP), permit number IDR05C979, for storm water discharges as a General Sawmill and Planing Mill (Sector A). I would like to express my appreciation for your staff's time and cooperation during the inspection.

JULY 2015 INSPECTION

VIOLATIONS

1. Part 5.1.2 of the MSGP states, in part, that the Stormwater Pollution Prevention Plan (SWPPP) site map must include:
 - directions of stormwater flow (use arrows);
 - locations of all existing structural control measures;
 - locations of all receiving waters in the immediate vicinity of your facility, indicating if any of the waters are impaired and, if so, whether the waters have TMDLs established for them;
 - locations of all stormwater conveyances including ditches, pipes, and swales;
 - locations of potential pollutant sources identified under Part 5.1.3.2;
 - locations of all stormwater monitoring points;
 - locations of stormwater inlets and outfalls, with a unique identification code for each outfall (e.g., Outfall No. 1, No. 2, etc), and an approximate outline of the areas draining to each outfall;
 - locations of the following activities where such activities are exposed to precipitation:
 - fueling stations;
 - loading/unloading areas;
 - locations used for the treatment, storage, or disposal of wastes;

- immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility;
- transfer areas for substances in bulk; and
- machinery.

At the time of the inspection, the inspector noted that the SWPPP site map was missing all of the above listed requirements. These are violations of Part 5.1.2 of the MSGP.

2. Part 4.1.1 of the MSGP states, in part, “Conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the effluent limits contained in this permit. Routine facility inspections must be conducted at least quarterly (i.e., once each calendar quarter) although in many instances, more frequent inspection (e.g., monthly) may be appropriate for some types of equipment, processes, and control measures or areas of the facility with significant activities and materials exposed to stormwater.”

Part 4.1.2 of the MSGP states, in part, “You must document the findings of each routine facility inspection performed and maintain this documentation onsite with your SWPPP as required in Part 5.4. You are not required to submit your routine facility inspection findings to EPA, unless specifically requested to do so. At a minimum, your documentation of each routine facility inspection must include:

- The name(s) and signature(s) of the inspector(s);
- Weather information and a description of any discharges occurring at the time of the inspection.

At the time of the inspection, a Facility representative told the inspector that the Facility had not performed routine quarterly facility inspections after April 2013. In addition, upon the inspector’s review of routine quarterly inspections from June 2010 through April 2013, the inspector noted that the documentation was missing the following requirements; names and signatures of the inspector, weather information, and a description of any discharges occurring at the time. These are violations of Parts 4.1.1 and 4.1.2 of the MSGP.

3. Part 7.2 of the MSGP states, in part, that the permittee “must submit an annual report to EPA that includes the findings from your Part 4.3 comprehensive site inspection and any corrective action documentation as required in Part 3.4. You must submit the annual report to EPA within 45 days (postmark date) after conducting the comprehensive site inspection to the address identified in Part 7.6.1.”

Part 7.5 of the MSGP states, “You must retain copies of your SWPPP (including any modifications made during the term of this permit), additional documentation requirements pursuant to Part 5.4 (including documentation related to corrective actions taken pursuant to Part 3), all reports and certifications required by this permit, monitoring data, and records of all data used to complete the NOI to be covered by this permit, for a period of at least 3 years from the date that your coverage under this permit expires or is terminated.”

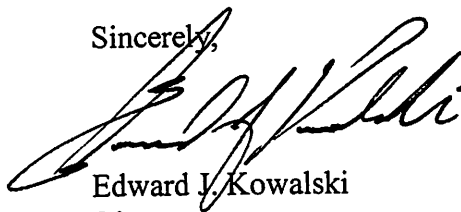
At the time of the inspection, the Facility could not produce the Annual Reports from 2010 through 2012 as requested by the inspector. These are violations of Part 7.5 of the MSGP.

On December 21, 2015, the NPDES Electronic Reporting Rule became effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR. Additional information is enclosed (Enclosure A).

Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the Permit requirements, and other appropriate statutes, and respond appropriately to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure B). If you have any questions concerning this matter, please do not hesitate to contact Raymond Andrews of my staff at (206) 553-4252.

Sincerely,



Edward J. Kowalski
Director

Enclosures

cc: Mr. Stephen Berry
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